

EXHIBIT E

From: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>

Sent: Wednesday, November 16, 2022 3:22 PM

To: Cross, David D. <DCross@mofo.com>; Bryan Tyson <btyson@taylorenghish.com>; Vincent Russo <vrusso@robbinsfirm.com>; Carey Miller <carey.miller@robbinsfirm.com>; 'David Lowman'

<David.Lowman@fultoncountyga.gov>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>

Cc: 'Bruce Brown' <bbrown@brucepbrownlaw.com>; 'Robert McGuire' <ram@lawram.com>; 'Halsey G. Knapp, Jr.' <hknapp@khlawfirm.com>; 'Adam M. Sparks' <sparks@khlawfirm.com>; Jessica G. Cino <cino@khlawfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; Elson, Hannah R. <HElson@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>

Subject: RE: Supplemental Discovery

External Email

David:

Good to see some of you yesterday. Thanks again for the email.

We will look through the pending requests and see if there is anything to supplement. Given that we have not received supplemented responses from either set of Plaintiffs, can you confirm that your clients will do the same?

Also – Bruce, can you confirm that your clients are also supplementing any discovery requests?

Thanks,
JB

ROBBINS

Josh Belinfante

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From: Cross, David D. <DCross@mofo.com>

Sent: Tuesday, November 15, 2022 8:27 AM

To: Bryan Tyson <btyson@taylorenghish.com>; Vincent Russo <vrusso@robbinsfirm.com>; Josh Belinfante

<Josh.Belinfante@robbinsfirm.com>; Carey Miller <carey.miller@robbinsfirm.com>; 'David Lowman'

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<hknapp@khlawfirm.com>; 'Adam M. Sparks' <sparks@khlawfirm.com>; Jessica G. Cino <cino@khlawfirm.com>; Kaiser,

Mary <MKaiser@mofo.com>; Elson, Hannah R. <HElson@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>;

Middleton, Caroline L. <CMiddleton@mofo.com>

Subject: Supplemental Discovery

Bryan and David -

We're nearing the close of discovery and we wanted to be sure that you're clients will comply with their obligations under Rule 26e to supplement their discovery responses and document productions with responsive information and materials not yet produced. Given we received your discovery responses and document productions last year (apart from some additional documents from the Secretary's Office recently regarding certain investigations) and given developments since we received those — such as the Coffee County breach coming to light, the CISA advisories, multiple elections, the upcoming audit, etc. — your clients must have additional information and documents responsive to our requests. Those should have been promptly produced on a rolling basis as they were created, as Rule 26e requires. But in any event, they need to be produced promptly now, before the close of discovery. Please let us know when we can expect this supplemental discovery.

Best,
DC

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